

**UNITED STATES DISTRICT COURT
FOR THE**

**GINA TURRA, ADMINISTRATRIX
Of the Estate of LOUIS C. TURRA,
Deceased, Individually and on
behalf of the Decedent's Estate
and SANTINO LOUIS TURRA, a minor
by his mother and natural guardian,
GINA TURRA, :**

Plaintiffs,

V.

**UNITED STATES OF AMERICA
c/o U.S. DEPARTMENT OF JUSTICE,
U.S. CUSTOM HOUSE,
2ND & CHESTNUT STREETS,
PHILADELPHIA, PA. 19106
Defendant.**

ORDER

AND NOW, this day of June 2002, upon consideration of the Motion of the United States ("moving defendant"), by and through the United States Attorney Patrick L. Meehan and Assistant United States Attorney Cedric D. Bullock for an enlargement of time, it is hereby ORDERED that the motion is GRANTED. It is further ORDERED that the moving defendants' response to Plaintiff's complaint shall be due no later than June 14, 2002.

BY THE COURT:

HONORABLE CLARENCE C. NEWCOMER
UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

**GINA TURRA, ADMINISTRATRIX
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**UNITED STATES OF AMERICA
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U.S. CUSTOM HOUSE,
2ND & CHESTNUT STREETS,
PHILADELPHIA, PA. 19106
Defendant.**

CIVIL ACTION NO. 02-3060

**THE MOVING DEFENDANT'S
MOTION FOR ENLARGEMENT OF TIME**

The United States (“moving defendant”), by and through United States Attorney Patrick L. Meehan and Assistant United States Attorney, Cedric D. Bullock hereby move the Court for an order allowing time to respond to Plaintiff’s complaint no later than July 14, 2002. The basis of the motion is that, the documents necessary to respond to Plaintiff’s complaint have not yet been obtained. In support of the motion, the moving defendant incorporates herein the attached Memorandum of Law.

WHEREFORE, the moving defendant requests that the Court grant the motion and enter an order in the form attached, extending the time within which the defendants may respond to Plaintiff's complaint.

Respectfully submitted,

Patrick L. Meehan
United States Attorney

James G. Sheehan
Chief, Civil Division

Cedric D. Bullock
Assistant United States Attorney

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MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR ENLARGEMENT OF TIME

The moving defendant has moved the Court for an order allowing time to respond to Plaintiffs' motion no later than July 14, 2002. The records necessary to respond to the allegations raised in Plaintiffs' motion have been requested, but not yet received. Thus, the Court should grant the instant motion and enlarge the time for filing a response.

Under Rule 6(b) of the Federal Rules of Civil Procedure, a reasonable extension of time may be granted upon cause shown if the request is filed before the original time period for response expires.

For the foregoing reasons, the moving defendant requests that the Court allow time to respond to the motion no later than July 14, 2002.

Respectfully submitted,

Patrick L. Meehan
United States Attorney

James G. Sheehan
Assistant United States Attorney
Chief, Civil Division

Cedric D. Bullock
Assistant United States Attorney
United States Attorney's Office
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106-4476
(215) 861-8413

Attorneys for Moving Defendant

Dated: May 30, 2002

CERTIFICATE OF SERVICE

The undersigned attorney for the moving defendant certifies that he has this date caused a true and correct copy of the foregoing Motion for Enlargement of Time to be served by first-class mail, postage prepaid, upon the following:

ALAN E. DENNENBERG, ESQUIRE
1200 WALNUT STREET
PHILADELPHIA, PA 19107

Cedric D. Bullock
Assistant United States Attorney

Dated: May 30, 2002